



Michael J. Willemin
mwillemin@wigdorlaw.com

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VIA ECF

The Honorable Robyn F. Tarnofsky
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 9B
New York, NY 10007

Re: [Parker v. Burstor, Civil Case No. 24 Civ. 245 \(JGLC\)\(RFT\)](#)

Dear Judge Tarnofsky:

We represent Plaintiff in this action and write in connection with our collection and search of electronically stored information (“ESI”) from January 2024 through the present. See Dkt. Nos. 134, 138. Based on our efforts to date, it appears that there are in excess of 83,000 messages that have been between Ms. Parker and the individuals referenced in the parties’ initial disclosures. To be very clear, as we have repeatedly noted, Ms. Parker is close friends with many of these individuals, and virtually all of the 83,000+ messages are between her and her friends. As such, the volume of messages is not indicative that Ms. Parker engaged in any inappropriate or threatening communications with witnesses.

In addition to the messages – which still need to be converted into the proper format and uploaded onto a review platform – we are working on ascertaining the number of emails and/or social media application messages between Ms. Parker and the relevant individuals, although we expect this number to be much smaller.

Given the overall volume of messages, as well as that work that must be done before we can start reviewing, we respectfully request two weeks – to September 17, 2024 – to complete our review. Part of the reason that we are requesting two weeks is that this review will be for communications related to Defendants’ application, as well as for responsive communications generally, so as not to have to review all of the messages twice.

We thank Your Honor for the Court’s time and consideration of this matter.

Respectfully submitted,

/s/
Michael J. Willemin